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13 Jul '91

Pamela J. Baxter, Project Manager
U. S. Environmental Protection Agency
Region II - Room 13-100
26 Federal Plaza
New York NY 10278

RE: SUPERFUND PROPOSAL
Asbestos Dump Site
Meyersville, NJ

Dear Ms. Baxter:

I wish to comment on the five alternative proposals to address the asbestos contaminated material (ACM) at this site. One of the difficulties in reaching a decision on this matter is that the Environmental Protection Agency (EPA) is probably not making an accurate assessment of the health hazards. Philip H. Abelson, the long-time president of the American Association for the Advancement of Science, is probably the single most respected scientist in the country. He addressed this very issue in an editorial in the 02MAR'90 issue of Science, faulting the EPA for arbitrarily lumping together a large class of different chemicals and calling them asbestos. There is no evidence that chrysotile, a white, water-soluble compound, causes disease (This form probably comprises most, if not all, of the asbestos in this dump site, but the EPA has not provided this data.) Crocidolite, actinolite, and related compounds are insoluble in the body and form long, sharp crystals that can penetrate the lungs. The EPA, according to Abelson, has "...fostered the view that a single fiber causes cancer," but there is no evidence for this-- in fact, we breathe in an estimated one million asbestos fibers per year from natural sources such as rocks.

If there is a health hazard, it should be corrected promptly and permanently. If not, the material at the dump site should be removed promptly and cheaply. Assuming that the EPA is not going to change its asbestos policy, then the site must continue to be considered a health hazard. This being the case, only one of the five alternatives is reasonable:

Alternative 1, no action, is unthinkable.

Alternative 2, native soil/vegetative cap, hardly differs from alternative 1. It simply sweeps the problem under the rug and provides no remedial effect.

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Alternative 5, ACM excavation and off-site landfill, is morally reprehensible. This method has the short-term effects of exposing workers and local residents to disturbance of the material and the long-term effect of dumping it, untreated, into somebody else's back yard.

Alternative 4, in-situ stabilization/solidification, is the method preferred by the EPA. Although this plan may achieve the goal of reducing health risks and appears to be cost-effective, the end result is not acceptable: (a) The increase in volume of the material and the top-soil covering would create a large, impermeable berm in the middle of a sensitive wetland area. (b) The chain-link fence that would surround the site will serve as an invitation to vandals, and will rust and erode within 30 or 40 years. (c) The chain-link fence and warning signs will reduce local property values and discourage visitors to the Great Swamp National Wildlife Refuge. (d) Most important, the chain link fence, like the first few graffiti in the subway, will serve as an invitation to further deface an already scarred environment.

Alternative 3, ACM excavation with off-site vitrification, is the correct solution. It removes the asbestos from the site and allows the land to be restored, as nearly as possible, to its natural state. The problem is not simply passed on to somebody else, because the vitrification process permanently decomposes and detoxifies the asbestos. The short-term costs are financially greater (\$20 million vs. \$5 million for Alternative 4), but it is the only plan that has a remedial effect on potential health problems while restoring the natural environment.

The necessity and the cost for a permanent clean-up goes far beyond the consideration of local health risks. The additional costs for doing the job right can be viewed as paying for both the physical removal of the asbestos and for promoting the view that natural resources have inherent value that must be protected, even if the cost is great. The house that my family and I live in was built by Josiah High in 1763. The grindstone in the front yard was used by the Lenape Indians before that. These individuals could have selected many other sites throughout what is now Passaic Township, but they recognized and appreciated the natural grandeur of the Great Swamp.

Not everybody has shared that view. In 1959, developers planned to turn the area into a huge airport. Thanks to the efforts of many local residents and environmental groups across the country, the Great Swamp National Wildlife Refuge was dedicated in 1964. It was the first such refuge in the country. Despite the attendant publicity, from 1968 to 1971, this region was used as a dumping ground for asbestos by the National Gypsum Company under the supervision of Passaic Township officials! To be fair, the view of asbestos as a hazardous material was not widespread at that time, but the township officials have occasionally shown similar lapses of sensitivity in their

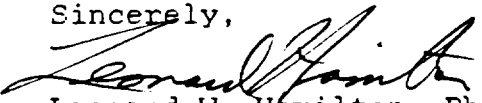
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approval of both private and commercial development in areas that encroach upon this last remaining natural resource in the township. The Great Swamp is not the town dump, and not even the town's back yard. It is a national treasure that adds esthetic and financial value to the township. It is time to clean it up.

The EPA is charged with the duty of protecting the environment, but their preferred plan shows a disregard for the land. When the last worker waves goodbye, we will become the permanent heirs to their monument to environmental desecration. I do not want the bicyclists to turn around when they see a chain link fence and warning signs-- they will miss seeing the great blue heron rookery, the barred owl, and perhaps the pileated woodpecker that lie ahead. I do not want my children, who inherit my house, to try to sell a home that is next to a dump site that has a rusted, partially fallen chain link fence that surrounds empty beer cans and pretzel boxes. I do not want your grandchildren to wonder why the area that used to be the Great Swamp National Wildlife Refuge has a two-acre plot of broken concrete.

The only viable solution is Alternative 3. It is the same solution that any right-thinking person would choose if some toxic substance were found in the living room. Do not leave it there, or sweep it under the rug, or throw it into the neighbor's yard, or put cement on it. Pay somebody to render it harmless, haul it away, and repair the damages.

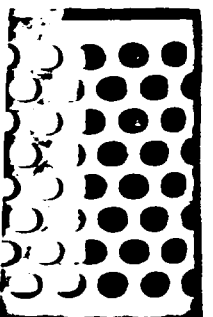
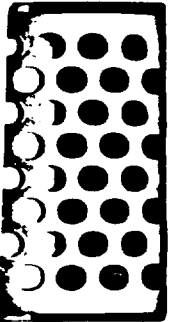
Sincerely,


Leonard W. Hamilton, PhD

cc: Great Swamp National Wildlife Headquarters
Great Swamp Residents Advisory Group
Echoes Sentinel
Senator Bill Bradley
Senator Richard Zimmer
Congressman Jim Courter
Scott Weiner, NJDEP

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